May 10, 1985

Draft - has not ( FW) been sent

Mr. Hal Robbins Air Quality Bureau Department of Health and Environmental Services Helena, Montana 59601

## Dear Hal:

Enclosed is the signed citation for the alleged violation of the ambient standard for fluoride in forage. As I told you during our phone conversation, I am perplexed as to the basis for the citation. Bob Raisch's cover letter refers to a level of  $57.7~\mu g/g$  at the Doane property during October of 1984. Our analyses, as reported to you by letter, on November 20, 1984 (attached), shows a monthly average of  $50\mu g/g$  at the Doane property. This is in compliance with the ambient fluoride standard.

In the past, ARCO's analytical laboratory data has been the basis for our compliance with Montana emission and ambient air quality standards. We collect and analyze forage samples for fluoride in accordance with the protocol as defined under ARM 16.8.813 of the State of Montana Air Quality Rules. A replicate aliquot of the forage sample is submitted to the Air Quality Bureau for quality control purposes.

If the citation is based upon Air Quality Bureau analyses of forage samples submitted to you, we would like to have a copy of your results, including replicate analyses. We also request a clarification of the analytical basis for determining compliance when interlaboratory analyses of split samples are not in agreement. At your convenience, we wish to meet with you to discuss this issue.

Sincerely,

Donald F. Ryan Technical Superintendent